

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

ROBERT CARTY, Individually and as Parent  
and Next Friend of Minor E.C.,

v.

UNITED PARCEL SERVICE, INC.

Civil Case No.: 1:19-cv-00354-JL

**JOINT MOTION FOR APPROVAL OF JOINT STIPULATED  
CONFIDENTIALITY AGREEMENT AND PROTECTIVE ORDER**

NOW COME the Plaintiff, Robert Carty, individually and as Parent and Next Friend of Minor E.C., by and through his attorneys, Primmer Piper Eggleston & Cramer, P.C., and the Defendant, United Parcel Service, Inc. (“UPS”), by and through its attorneys, Devine, Millimet & Branch, P.A., (each individually a “Party” and collectively the “Parties”), pursuant to Rule 26.2 of the Local Rules of the United States District Court for the District of New Hampshire, and hereby state as follows:

1. On June 3, 2019, the Parties agreed that certain information may be produced in the course of discovery requiring a “CONFIDENTIAL” designation so as to prevent unnecessary disclosure or dissemination of confidential, proprietary, commercial, trade secrets, or other competitive, personal, or confidential information.

2. In light of the foregoing, the Parties agreed to submit a Joint Stipulated Confidentiality Agreement and Protective Order with this Court, which is being filed simultaneously with this Motion and is attached hereto as Exhibit A.

WHEREFORE, the Parties respectfully request that this Honorable Court:

A. Grant this Joint Motion for Approval of the Joint Stipulated Confidentiality Agreement and Protective Order filed herewith; and

B. Grant such other and further relief as this Court deems just and necessary.

Respectfully submitted,

**Robert Carty, Individually  
and As Parent and Next Friend  
of Minor Child, E.C.**

By His Attorneys,  
PRIMMER PIPER EGGLESTON  
AND CRAMER, P.C.

Date: June 14, 2019

By: /s/ Gary M. Burt  
Gary M. Burt, #5510  
John D. Prendergast, #266235  
P.O. Box 3600  
Manchester, NH 03105-3600  
603.626.3300  
gburt@primmer.com  
jprendergast@primmer.com

Respectfully submitted,

**United Parcel Service, Inc.**

By Its Attorneys,

DEVINE, MILLIMET & BRANCH, P.A.

Dated: June 14, 2019

By: /s/ Jonathan M. Eck  
Jonathan M. Eck, Esq. (NH Bar #17684)  
111 Amherst Street  
Manchester, NH 03101  
(603) 695-8742  
jeck@devinemillimet.com

**CERTIFICATION**

I, Jonathan M. Eck, certify that on this date service of the foregoing document was made upon counsel of record via the Court's CM/ECF System

Dated: June 14, 2019

/s/ Jonathan M. Eck  
Jonathan M. Eck, Esq. (NH Bar #17684)